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ATTORNEY FOR PLAINTIFF

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF CALIFORNIA

)	CASE NO: C07-03916 PVT
)	
CARLOS MARIN)	1) MOTION TO MOVE CASE
)	MANAGEMENT CONFERENCE
PLAINTIFF,)	
)	
VS.)	
)	
YOEL HANEGBI AND DOES 1-10 DBA)	
)	
ESHONE ELECTRIC)	
)	
DEFENDANTS)	
)	
)	

NATURE OF CASE

This is an action on behalf of CARLOS MARIN Plaintiff moves to continue the Case Management conference for the following reasons:

- 1) The first Case Management conference is set for November 2, 2007
- 2) The Complaint was filed on July 24, 2007.
- 3) The Complaint was served on September 25, 2007.
- 4) The Defendants have neither answered the complaint nor obtained an attorney.

1 5) The Plaintiff's attorney has sent a letter to the Defendant in today's mail asking them to retain
2 an attorney or answer the complaint within ten days or we will file for default judgment.

3 6 The Plaintiff's attorney respectfully requests that the Case Management Conference be pushed
4 back until December 7, 2007 in order to give the Defendants more time to answer or obtain an
5 attorney. In the alternative if the Defendants fail to respond in ten days, the Plaintiff will file for
6 default.

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8 Dated October 30, 2007

9 Respectfully Submitted

10 s/jdb_____

11 James Dal Bon

12 Attorney for the Plaintiff
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DECLARATION OF JAMES DAL BON

1) I declare under the penalty of perjury by the laws of the State of California that the following is true and correct:

2) The Proofs of Service attached to this Motion and marked Exhibit 1 are true copies of the Proofs our process server signed in this case.

3) The letter attached to this motion and marked Exhibit 2 is a true copy of a letter sent in today's mail to the defendants.

October 30, 2007

____s_/jdb_____

James Dal Bon

Attorney for Plaintiff

1 Dated:

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4 IT IS SO ORDERED,

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6 _____
7 Honorable United States Court Magistrate Judge

8 Patricia Trumbull
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